

**EXHIBIT A**

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF QUEENS

ROBERT HARRISON,

Plaintiff,

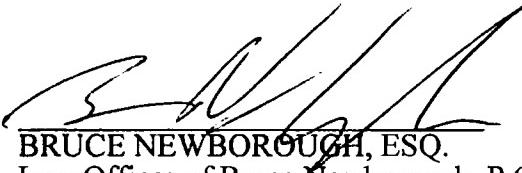
- against -

GRZEGORZ WNOROWSKI, CARLOS EUGENE SALAS  
and NAVAJO EXPRESS INC.,

Defendants.

Index No.:  
Date Purchased:  
**SUMMONS**Plaintiffs designate QUEENS  
County as the place of trial.The basis of venue is:  
Plaintiff's place of residencePlaintiff resides at:  
27-10 8th Street, Apt 2C  
QUEENS, NY 11102  
County of QUEENS**To the above named Defendants:**

**You are hereby summoned** to answer the complaint in this action, and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance on the Plaintiff's attorney(s) within twenty days after the service of this summons, exclusive of the day of service, where service is made by delivery upon you personally within the state, or, within 30 days after completion of service where service is made in any other manner. In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: Brooklyn, New York  
December 21, 2021

BRUCE NEWBOROUGH, ESQ.  
Law Offices of Bruce Newborough, P.C.  
Attorneys for Plaintiff  
ROBERT HARRISON  
2104 Flatbush Avenue  
Brooklyn, New York 11234  
718-701-8826

TO: GRZEGORZ WNOROWSKI  
190 Kent Road  
Warren, CT 06754CARLOS EUGENE SALAS  
2129 S Loop 289  
Lubbock, TX 79423NAVAJO EXPRESS INC.  
1400 W 64th Avenue  
Denver, CO 80221

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF QUEENS

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**ROBERT HARRISON,**

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**X****Plaintiff,****Index No.:  
Date Purchased:****- against -****VERIFIED COMPLAINT****GRZEGORZ WNOROWSKI, CARLOS EUGENE SALAS  
and NAVAJO EXPRESS INC.,****Defendants.**

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**X**

Plaintiff, **ROBERT HARRISON**, by his attorneys, **LAW OFFICES OF BRUCE NEWBOROUGH, P.C.**, complaining of the Defendants, **GRZEGORZ WNOROWSKI, CARLOS EUGENE SALAS and NAVAJO EXPRESS INC.**, respectfully allege, upon information and belief:

1. At all times herein mentioned, Plaintiff **ROBERT HARRISON** was, and still is, a resident of the County of QUEENS, City and State of New York.

2. At all times herein mentioned, Defendant **NAVAJO EXPRESS INC.** is and was a domestic corporation duly organized and existing under and by virtue of the laws of the State of Colorado.

3. At all times herein mentioned, Defendant **NAVAJO EXPRESS INC.** is and was a foreign corporation duly authorized to conduct business within the State of Colorado.

4. At all times herein mentioned, Defendant **CARLOS EUGENE SALAS** was, and still is a resident of the County of Lubbock, State of Texas.

5. At all times herein mentioned, Defendant **GRZEGORZ WNOROWSKI** was, and still is, a resident of the County of Litchfield, City and State of Connecticut.

6. At all times herein mentioned, Defendant **NAVAJO EXPRESS INC.** was the owner of a box truck bearing Indiana State registration number 3046232.

7. At all times herein mentioned, Defendant **CARLOS EUGENE SALAS** operated the aforesaid box truck bearing Indiana State registration number 3046232.

8. At all times herein mentioned, Defendant **CARLOS EUGENE SALAS** operated the aforesaid box truck with the permission of Defendant **NAVAJO EXPRESS INC.**

9. At all times herein mentioned, Defendant **CARLOS EUGENE SALAS** operated the aforesaid box truck with the consent of Defendant **NAVAJO EXPRESS INC.**

10. At all times herein mentioned, Defendant **CARLOS EUGENE SALAS** operated the aforesaid box truck in the scope of her employment with Defendant **NAVAJO EXPRESS INC.**

11. At all times herein mentioned, Defendant **NAVAJO EXPRESS INC.** managed the aforesaid box truck bearing Indiana State registration number 3046232.

12. At all times herein mentioned, Defendant **CARLOS EUGENE SALAS** managed the aforesaid box truck bearing Indiana State registration number 3046232.

13. At all times herein mentioned, Defendant **NAVAJO EXPRESS INC.** controlled the aforesaid box truck bearing Indiana State registration number 3046232.

14. At all times herein mentioned, Defendant **CARLOS EUGENE SALAS** controlled the aforesaid box truck bearing Indiana State registration number 3046232.

15. At all times herein mentioned, Defendant **NAVAJO EXPRESS INC.** maintained the aforesaid box truck bearing Indiana State registration number 3046232.

16. At all times herein mentioned, Defendant **CARLOS EUGENE SALAS** maintained the aforesaid box truck bearing Indiana State registration number 3046232.

17. At all times herein mentioned, Defendant **GRZEGORZ WNOROWSKI** owned the aforesaid motor vehicle bearing Connecticut State registration number AV74081.

18. At all times herein mentioned, Defendant **GRZEGORZ WNOROWSKI** was the operator of a 2020 motor vehicle bearing Connecticut State registration number AV74081.

19. At all times herein mentioned, Defendant **GRZEGORZ WNOROWSKI** managed the aforesaid motor vehicle bearing Connecticut State registration number AV74081.

20. At all times herein mentioned, Defendant **GRZEGORZ WNOROWSKI** controlled the aforesaid motor vehicle bearing Connecticut State registration number AV74081.

21. At all times herein mentioned, Plaintiff **ROBERT HARRISON** was a passenger in the vehicle owned and operated by Defendant **GRZEGORZ WNOROWSKI**.

22. At all times herein mentioned, 47<sup>th</sup> Street at or near the intersection with Grand Avenue, in the County of QUEENS, State of New York, were public roadways, streets and/or thoroughfares.

23. That on October 19, 2020, Defendant **GRZEGORZ WNOROWSKI** was operating the aforementioned motor vehicle bearing Connecticut State registration number AV74081, at the aforementioned location.

24. That on October 19, 2020, the motor vehicle owned by Defendant **NAVAJO EXPRESS INC.** and operated by Defendant **CARLOS EUGENE SALAS** came into contact with the motor vehicle operated by Defendant **GRZEGORZ WNOROWSKI** and owned by , in which Plaintiff **ROBERT HARRISON** was a passenger.

25. That on October 19, 2020, at the aforementioned location, the motor vehicle owned by Defendant **NAVAJO EXPRESS INC.** and operated by Defendant **CARLOS EUGENE SALAS** came into contact with the motor vehicle owned and operated by Defendant **GRZEGORZ WNOROWSKI**, in which Plaintiff **ROBERT HARRISON** was a passenger.

26. That the aforesaid occurrence was caused wholly and solely by reason of the negligence of the Defendants without any fault or negligence on the part of the Plaintiff contributing thereto.

27. That Defendants were negligent, careless and reckless in the ownership, operation, management, maintenance, supervision, use and control of the aforesaid vehicles and the Defendants were otherwise negligent, careless, and reckless under the circumstances then and there prevailing.

28. That by reason of the foregoing, Plaintiff **ROBERT HARRISON** sustained severe and permanent personal injuries; and Plaintiff **ROBERT HARRISON** was otherwise damaged.

29. That Plaintiff **ROBERT HARRISON** sustained serious injuries as defined by §5102(d) of the Insurance Law of the State of New York.

30. That Plaintiff **ROBERT HARRISON** sustained serious injuries and economic loss greater than basic economic loss as defined by §5102 of the Insurance Law of the State of New York.

31. That this action falls within one or more of the exceptions set forth in CPLR §1602.

32. That by reason of the foregoing, Plaintiff **ROBERT HARRISON** has been damaged in a sum which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

**WHEREFORE**, Plaintiff demands judgment against the Defendant herein, in a sum exceeding the jurisdictional limits of all lower courts which would otherwise have jurisdiction, together with the costs and disbursements of this action.

Dated: Brooklyn, New York  
December 21, 2021

Yours, etc.



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**BRUCE NEWBOROUGH, ESQ.**  
Law Offices of Bruce Newborough, P.C.  
Attorneys for Plaintiffs  
**ROBERT HARRISON**  
2104 Flatbush Avenue  
Brooklyn, New York 11234  
718-701-8826

**ATTORNEY VERIFICATION**

STATE OF NEW YORK

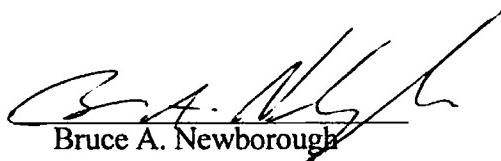
COUNTY OF KINGS SS:

The undersigned, an attorney admitted to practice in the Courts of New York State, states, that affirmant is an attorney for the Plaintiff, that affirmant has read the foregoing Summons and Verified Complaint and knows the contents thereof, and that the same is true to affirmant's knowledge, except as to the matters therein stated to be alleged on information and belief, and that as to those matters affirmant believes it to be true.

That the reason why this verification is made by affirmant and not by the Plaintiff is because the Plaintiff is not within KINGS COUNTY where the attorneys maintain their offices; and that the source of affirmant's knowledge, and the grounds of belief as to those matters therein stated to be alleged on information and belief are correspondence and investigations which have been made concerning the subject matter of this action, and which are in the possession of the said attorneys.

The undersigned affirms that the foregoing statements are true, under the penalties of perjury.

Dated: Brooklyn, New York  
December 21, 2021

  
Bruce A. Newborough

*Index No.:*

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF QUEENS

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ROBERT HARRISON,  
Plaintiff,

- against -

GRZEGORZ WNOROWSKI, CARLOS EUGENE SALAS and NAVAJO EXPRESS INC.,  
Defendants.

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**SUMMONS AND VERIFIED COMPLAINT**

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**Law Offices of Bruce Newborough, P.C.**

Attorneys for Plaintiff  
ROBERT HARRISON  
2104 Flatbush Avenue  
Brooklyn, New York 11234  
(718)701-8826

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To:

GRZEGORZ WNOROWSKI  
190 Kent Road  
Warren, CT 06754

CARLOS EUGENE SALAS  
2129 S Loop 289  
Lubbock, TX 79423

NAVAJO EXPRESS INC.  
1400 W 64th Avenue  
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